

EXHIBIT D

PAUL HASTINGS

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December 8, 2023

Hon. Analisa Torres
United States District Court
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: United States v. Kwok, et al, 1:23-cr-118 (AT)

Dear Judge Torres:

As the Court is aware, we represent Luc Despins, in his capacity as the chapter 11 trustee (the “Trustee”) in the chapter 11 bankruptcy case of defendant Ho Wan Kwok pending in the United States Bankruptcy Court for the District of Connecticut. We are in receipt of the Motion for Return of Property, dated December 6, 2023 (Dkt. 186 (“Motion”)), as well as the Court’s order directing the Government to file a response to the Motion by December 19, 2023.

Because the Motion implicates property of the chapter 11 estate and seeks relief that would violate the automatic stay, the Trustee respectfully requests the opportunity to submit a letter in response to the Motion, which letter the Trustee would be prepared to file by no later than December 19, 2023 or such earlier time as the Court may direct.

Respectfully submitted,

/s/ Nicholas A. Bassett

Nick A. Bassett
of PAUL HASTINGS LLP

NAB